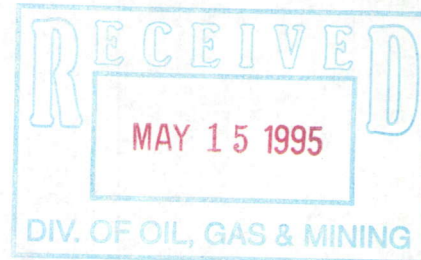


Kennecott Utah Copper Corporation
8315 West 3595 South
P.O. Box 6001
Magna, Utah 84044-6001
(801) 252-3000

M/035/015

Kennecott

May 11, 1995



Tom Johnson
Biosolids Program Manager
Water Management Division
Environmental Protection Agency
999 18th Street - Suite 500
Denver, Colorado 80202-2466

Subject: Application to Apply Biosolids for Mine Reclamation at
Greater than Agronomic Rates

Dear Mr. Johnson:

Kennecott is requesting authorization for the one time application of Biosolids to a mine land reclamation site in excess of the agronomic rate. Under 40 CFR 503.14(d), EPA approval is required for the application of biosolids at rates in excess of the agronomic rate. The application of Biosolids would be done in conformance with all other sections of 40 CFR 503 as required for land application. The biosolids will be obtained from Central Valley Water Reclamation Facility (CVWRF).

The general location of the reclamation site is shown on Figure 1 and a more detailed location of the proposed site is shown on Figure 2. Reclamation of this site is desirable because of the presence of barren mine soils and the rocky nature of the surface soils. These mine soils have been present at the site for many years. Due to the lack of organic matter and other agronomic values, the soils have failed to establish good vegetative cover.

The agronomic rate for the reclamation species that will be planted is slightly greater than 2 tons per acre, while the requested application rate is 40 tons per acre. Based on an evaluation of fourteen sets of CVWRF data taken last year, the ceiling concentration limits for metals will not be exceeded by this application rate. An earlier study conducted on Kennecott property has shown preliminary results which indicate that higher application rates of biosolids have the highest probability of vegetation success. Thus, Kennecott feels that 40 tons per acre will be the most effective application rate to ensure reclamation success.

(207) (EPA OKd.)

The reclamation site is located within the Mine Permit area regulated by the Division of Oil Gas and Mining. No public access is allowed. As shown by a piezometer at the site, the depth to ground water is over 200 feet. The closest municipal well is located approximately 3 miles to the east and the nearest private well is located over 1000 feet away. The nearest significant surface water feature is Little Valley Wash, an

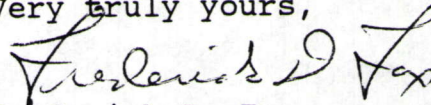
Mr. Tom Johnson
May 11, 1995
Page 2

intermittent stream which is included in our UPDES permit as Outfall SW3 and flows only as the result of high intensity storms. Biosolids would not be applied within 10 meters of the stream channel.

Site grading is now in progress at the site. To be effective for this summer, we must proceed with the application of the biosolids within the next few weeks; therefore, we would appreciate an early response to our request.

If you need additional information and/or clarifications on this request, please contact Ric Jones at 569-6640 or me.

Very truly yours,

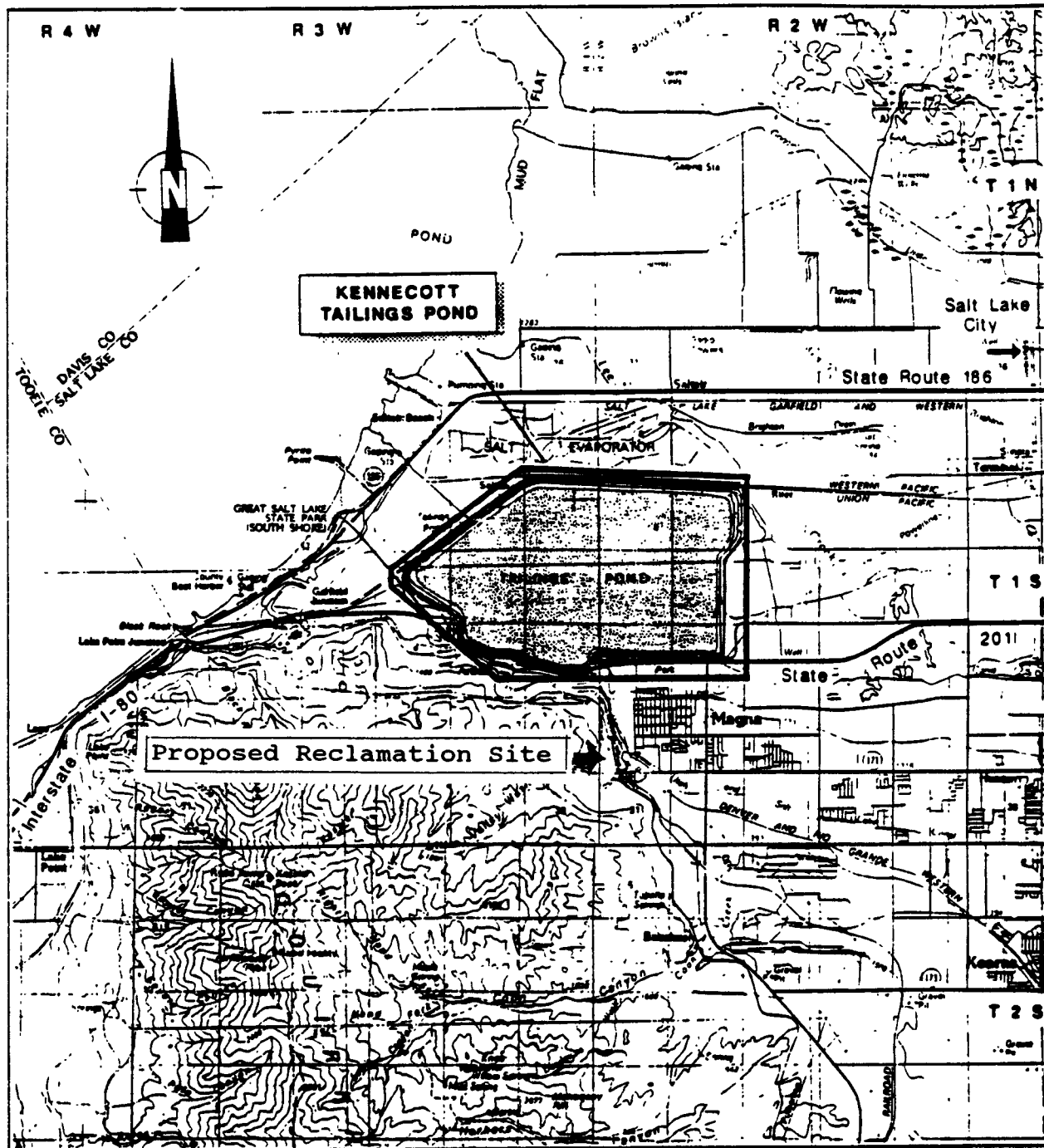


Frederick D. Fox
Director, Environmental Affairs

FDF:rj

Attachment

cc: Mel Muir
Lisa Rogers
DOGM

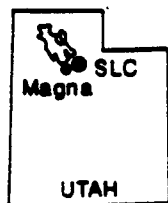


Source: Tooele Topographic, Utah, USGS, 1979

0 1 2 3 4 Miles

LOCATION MAP

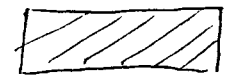
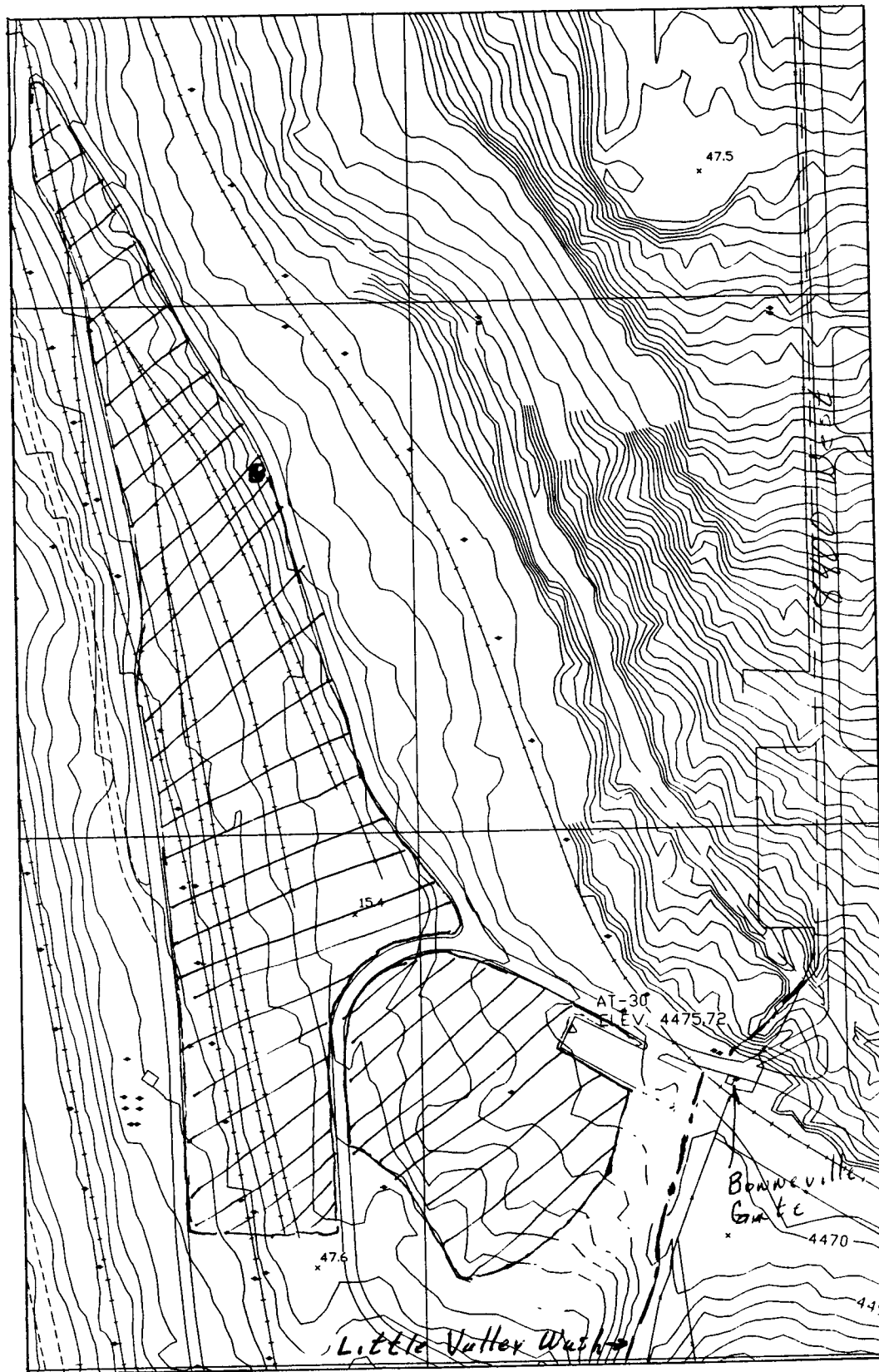
LEGEND



Site location

Location Map

Figure 1



Area to
be reclaimed
using Biosolids



⊕ Piezometer
Location

Scale
0 300

Reclamation Site

Figure 2